

The Honorable Judge Richard Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

Jo Anna Lang, PR of the estate Dick  
Lang, Wife and Husband, adoptive  
parents of C.L., a minor child and  
R.L., a minor child, Jo Anna Lang,  
guardian ad litem, for C.L. and R.L.,  
Plaintiffs,

v.

STATE OF WASHINGTON, DEPARTMENT  
OF SOCIAL AND HEALTH SERVICES,  
(DSHS) CHILD PROTECTIVE SERVICES,  
(CPS), Kaytena Gonzalez, individually  
and MARK AUSTIN GONZALEZ and as a  
marital community, Pamela Williams,  
individually, and Alan Robert Evans  
individually and as a marital  
community, Jennifer White and John  
DOE White individually and as a  
marital community, Laura Caruso,  
John Doe Caruso, individually and as  
a marital community; Sarah Coshow,  
and JOHN DOE Coshow, individually

Case No.: 3:20-cv-05057

EMERGNCY MOTION FOR A MEDICAL  
STAY OF PROCEEDINGS UNTIL  
**SEPTEMBER 30, 2020**

NOTED FOR CONSIDERATION:  
SEPTEMBER 11, 2020

1 and as a marital community, Janelle  
2 E. Redmond and JOHN DOE  
3 Redmond, individually and as a  
4 marital community, Lorraine  
5 Martinez, and JOHN DOE Martinez,  
6 individually and as a marital  
7 community, Beth A. Kutzera, and  
8 JOHN DOE Kutzera, individually and  
9 GLENN T. KUTZERA as a marital  
10 community, J. Aaron Merino, and  
11 JOHN DOE Merino; Jaimee Scheffler,  
12 individually and JOHN DOE Scheffler  
13 as a marital community,  
14 And,  
15 Office of the Attorney General, State  
16 Agency, Danial Hsieh, AAG  
17 And,  
18  
19 Vancouver Police Department,  
20 And,  
21 Cowlitz County Sheriff's Department,  
22 And,  
23  
24 Eimiko Murlin and Jeff Ian Murlin,  
25 individually and as a marital  
26 community, were foster parents of  
27 C.L.  
28 And,  
29 Steve Vallembois, Jimmy Howard, Foster  
30 Parents for R.L., Individually,  
And,

1  
2 Court Appointed Special Advocate,  
3 CASA, its agent Kathy A. Shirilla,

4 And,

5 Kimberly Copeland, MD, Legacy  
6 Salmon Creek Medical Center,

7 Defendants.  
8

9 I. MOTION

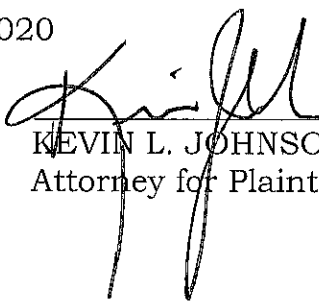
10 COMES NOW the above-named Plaintiffs, by and through their attorney  
11 of record, KEVIN L. JOHNSON, P.S., Attorney & Counselor at Law, after an  
12 exhaustion of all procedures in Washington state, my Doctor recommended  
13 that attend medical appointments at University California Los Angeles (UCLA).  
14

15 This Motion started out as a stipulated motion but many of the email  
16 address for defendants came back non deliverable and some attorneys were on  
17 furlough due to the Covid-19 pandemic.  
18

19 II. RELIEF REQUESTED

20 Plaintiff's counsel requests a stay responding to all defendants 12(b)(6)  
21 motions until September 30, 2020 due to medical conditions.  
22

23 DATED this 3 day of September 2020

24  
25   
26 KEVIN L. JOHNSON, WSBA #24784  
27 Attorney for Plaintiffs  
28  
29  
30